

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jennifer J. Pearson-Mills dba Jennifer's Stay & Play Preschool, Inc. dba Jennifer's Family Child Daycare, Inc.

Debtor

The Bank of New York Mellon f/k/a The Bank of New York as successor to JP Morgan Chase Bank, N.A. as Trustee, for the ABFS Mortgage Loan Trust 2003-2 Mortgage Pass-Through Certificates, Series 2003-2, its successors and/or assigns

Moving Party

vs.

Jennifer J. Pearson-Mills dba Jennifer's Stay & Play Preschool, Inc. dba Jennifer's Family Child Daycare, Inc.

Debtor

William C. Miller Esq.

Trustee

CHAPTER 13

NO. 15-19120 AMC

11 U.S.C. Section 362

PRAECIPE TO WITHDRAW

TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly withdraw the Motion to Approve Loan Modification of The Bank of New York Mellon f/k/a The Bank of New York as successor to JP Morgan Chase Bank, N.A. as Trustee, for the ABFS Mortgage Loan Trust 2003-2 Mortgage Pass-Through Certificates, Series 2003-2, which was filed with the Court on or about 11/21/2016.

Respectfully submitted,

/s/Denise Carlon, Esquire

Denise Carlon, Esquire
Thomas Puleo, Esquire
Attorneys for Movant/Applicant
KML Law Group, P.C.
Main Number: (215) 627-1322

December 13, 2016